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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

5 IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

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**AMENDED MASTER SHORT FORM  
COMPLAINT FOR DAMAGES FOR  
INDIVIDUAL  
CLAIMS**

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8 Plaintiff(s) named below, for their Complaint against Defendants named below,  
9 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc 364).  
10 Plaintiff(s) further show the Court as follows:

11 1. Plaintiff/Deceased Party:

12 Michael Blevins

13 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
14 consortium claim:

15 Not applicable

16 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,  
17 conservator):

18 Not applicable

19 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
20 the time of implant:

21 Kentucky

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5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

## Kentucky

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

## Kentucky

7. District Court and Division in which venue would be proper absent direct filing:

United States District Court for the Eastern District of Kentucky,

Pikeville Division

8. Defendants (check Defendants against whom Complaint is made):

x C.R. Bard Inc.

x Bard Peripheral Vascular, Inc.

#### **9. Basis of Jurisdiction:**

## x Diversity of Citizenship

Other:

a. Other allegations of jurisdiction and venue not expressed in Master  
Complaint:

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## Defendants' Inferior Vena Cava Filter

### claim (Check applicable inferior Ve

Ge® II G E 1

- G2® Express (G2®X) Vena Cava Filter
  - Eclipse® Vena Cava Filter
  - Meridian® Vena Cava Filter
  - Denali® Vena Cava Filter
  - Other:

11. Date of Implantation as to each product:

November 25, 2011

12. Counts in the Master Complaint brought by Plaintiff(s):

- x Count I: Strict Products Liability – Manufacturing Defect
  - x Count II: Strict Products Liability – Information Defect (Failure to Warn)
  - x Count III: Strict Products Liability – Design Defect
  - x Count IV: Negligence - Design
  - x Count V: Negligence - Manufacture
  - x Count VI: Negligence – Failure to Recall/Retrofit
  - x Count VII: Negligence – Failure to Warn
  - x Count VIII: Negligent Misrepresentation
  - x Count IX: Negligence *Per Se*
  - x Count X: Breach of Express Warranty
  - x Count XI: Breach of Implied Warranty
  - x Count XII: Fraudulent Misrepresentation

- Count XIII: Fraudulent Concealment
  - Count XIV: Violations of Applicable Kentucky \_\_\_\_\_ (insert state)  
Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
  - Count XV: Loss of Consortium
  - Count XVI: Wrongful Death
  - Count XVII: Survival
  - Punitive Damages
  - Other(s): \_\_\_\_\_ (please state the facts supporting this Count in the space immediately below)

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1 RESPECTFULLY SUBMITTED this 6th day of March 2017.

2 **SKIKOS CRAWFORD SKIKOS & JOSEPH**

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4 By: /s/ Melissa Mielke

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10 *Attorneys for Plaintiffs*

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